Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Assessment and Collection of Regulatory Fees	)	MD Docket No. 17-134
for Fiscal Year 2017	)	

COMMENTS OF
CRC BROADCASTING COMPANY, INC.

CRC Broadcasting Company, Inc. ("CRC")[1] submits these comments in response to the Commission's *Notice of Proposed Rulemaking*[2] ("*2017 NPRM*") relative to the assessment of regulatory fees to broadcast licensees for Fiscal Year 2017.

The *2017 NPRM* invites comments, beginning at paragraph 19, regarding revised ratios and reduction of regulatory fees for the two lowest tiers of AM/FM Broadcasters from the 2016 Regulatory Fees. CRC, as the licensee of two AM stations in the Phoenix AZ radio market, believes the *2017 NPRM* does not go far enough in alleviating the hardship imposed upon small AM broadcasters in large population markets, who must compete against a multitude of FM stations and other media, but must pay significantly more (on a cost versus revenue basis) than its FM counterparts. Most AM stations generate significantly less revenue than their FM competitors, yet on a regulatory fee basis in the same market, must pay anywhere from 66% to 75% of a comparable FM regulatory fee. AM stations from a revenue standpoint generally do not bill anywhere

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[1] CRC is an FCC licensee of KFNN, a Class D AM station, and KQFN, a Class B AM station, both licensed to the Phoenix AZ radio market, with an affiliated company holding 2 AM licenses in the Palm Springs, CA market.
[2] *Notice of Proposed Rulemaking* in MD Docket No.17-134 (rel. May 23, 2017)("*Notice*" or *"NPRM")*

near 66% to 75% of comparable FM stations in the top 50 radio markets. While the Commission does have a case by case waiver provision available to broadcasters who are economically disadvantaged, the cost of engaging that process and documentation required to substantiate a claim generally is more than the potential savings achievable. The current waiver or reduction request process is prescribed in 47 USC §159(d) and 47 CFR §1.1116 and requires "good cause shown" and a finding of the reduction/waiver as being in the "public interest". The Commission's rules currently require such requests to be accompanied by full payment of the prescribed regulatory fees, and while requiring a showing of "financial hardship" for waiver requests, the rules do not state the standards or showings necessary for reduction requests. While the Commission's efforts in Docket 13-249 (the "*AM Revitalization Rulemaking*") have and hopefully will continue to help struggling AM operators, CRC suggests that the economic disparities between AM and FM facilities should be better reflected in the regulatory fee schedules, particularly in the top tiers where the disparity between AM and FM revenues is much greater than in smaller markets.

Conclusion

For the foregoing reasons, CRC requests the Commission consider further revisions to the proposed 2017 regulatory fees to better reflect the economic realities between AM and FM stations, particularly in the top two population tiers.

Respectfully Submitted

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